REASONS FOR EXPEDITED SCHEDULE

- Present Schedule Concerns:

We feel that a reliable burner design can be developed, fabricated and installed by the end of the Spring 92, Unit 1 Outage. We do not recommend extensive testing periods for B&W design evolution purposes.

- Major Rebuilds:

The EER report specifies a 5-7 year anticipated cycle for major rebuild requirements on the burners. We are essentially at the end of the first cycle.

- Safety:

Windbox fire/explosion potential was identified as a significant concern by Mr. Bill Newkirk in his recent IGS burner inspection report.

- Budget:

Installation of burners is identified within the 91-92 fiscal budget. Consideration should be given to potential impact of delaying budget utilization.

- Short-Term Testing:

We feel strongly that sacrificing expedited replacement of burners for the sake of a 6 month test is not a responsible approach.

- Stabilizer Verification:

We feel that our questions regarding the RJM Stabilizer can be reliably and responsibly answered well before replacement of Unit 1 burners. We recommend that RJM flow stabilizers be installed on a trial basis for verification purposes on Unit 2, during the upcoming fall outage.

- Utilize Unit 1 Spring 92 Outage:

Foregoing one outage results in a continuation of present maintenance requirements and operational risks for a minimum of one year. With a design dependant upon on operational testing, the schedule is extended even longer.

- Independant Evaluation of Air Flow Metering:

We feel evaluation and selection of potential air-flow metering should be carefully and comprehensively pursued. There is no reason why we cannot complete an independant engineering investigation and recommendation totally apart from the burner project critical path.

- Independent Evaluation of Scanners

We feel the potential addition of a second scanner should be handled in the same manner as air flow metering discussed above, i.e. totally separate from the burner project critical path.

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